

UNITED STATES DISTRICT COURT

FIRST CIRCUIT

DISTRICT OF MASSACHUSETTS

FILED

2005 MAY 19 P 1:22

Joseph E. Dockham  
Plaintiff

V.

AFFIDAVIT IN SUPPORT OF MOTION  
FOR APPOINTMENT OF COUNSEL TO  
REPRESENT ON WRIT OF HABEAS CORPUS

U.S. DISTRICT COURT

Michael Corsini  
Superintendent Bay State  
Correctional Center  
Defendant

05 11053 NMG

I, Joseph E. Dockham, do hereby depose and say:

1. That I am a person whom is without funds to retain paid, competent, knowledgeable and skilled Legal Counsel to represent him in regards to matter presently set before the Honorable Court.

2. Previously appointed (state) counsel has informed said party that representation on present action is beyond her authority from the Committee for Public Counsel Services, as well as beyond her knowledge of the law as applied to Federal Habeas Corpus and Federal Appeals.

3. Previous appointed counsel has informed said party that it would be in his best interest to file a motion to have counsel appointed, as she believes that there were some grievous errors made in the plaintiff's case, errors which would require skilled review under Federal Appeal.

4. The law library at such a small institution is very limited in what assistance it can offer in the area of Federal research and filing of proper paperwork, the plaintiff is very limited in his knowledge of the legal process.

Affidavit in support of motion  
for appointment of counsel to  
represent on writ of habeas  
corpus continued:

5. The plaintiff would require competent, knowledgeable and skilled legal counsel to ensure that he would be afforded proper legal representation and that he would not be effectively precluded from presenting all pertinent facts pertaining to all issues being presented to the Honorable Court.

THIS AFFIDAVIT DRAFTED THIS 25<sup>th</sup> DAY  
OF April IN THE YEAR OF  
THE LORD  
2005

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY.

By the Plaintiff,  
Joseph E. Dockham  
Joseph E. Dockham W-43918  
Bay State Correctional Center  
P.O. Box 73 28 Clark St.  
Norfolk, MA 02056-0073